

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: JAMES MICHAEL NEIL CHANCE

CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS

CHAPTER 13 TRUSTEE

Movant

CASE NO: 1-22-01893-HWV

vs.

JAMES MICHAEL NEIL CHANCE et

al.

Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on October 31, 2022, Jack N. Zaharopoulos, Standing Chapter 13 Trustee, through his attorney, Douglas R. Roeder, Esquire, and moves this Honorable Court for dismissal of the above-captioned Chapter 13 bankruptcy case for the following reason(s):

- 1) A Petition under Chapter 13 was filed on September 30, 2022.
- 2) The Debtor has not filed the following items or a motion for extension of time to file same pursuant to F.R.B.P. 1007(c).
  - **Form 122C-1 CHAPTER 13 STATEMENT OF CURRENT MONTHLY INCOME AND CALCULATION OF COMMITMENT PERIOD**
  - **Form 122C-2 CHAPTER 13 CALCULATION OF YOUR DISPOSABLE INCOME**
- 3) If upon receipt of this Motion and the Notice, Debtors file the missing documents on or before the response date specified on said notice, the Motion shall be deemed withdrawn and moot.

WHEREFORE, your Trustee prays that this Honorable Court enter an Order dismissing the above-captioned case.

Dated: October 31, 2022

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire

ID: 80016

Attorney for Movant

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

8125 Adams Drive, Suite A

Hummelstown, PA 17036

Phone: (717) 566-6097

email: droeder@pamd13trustee.com

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CASE NO: 1-22-01893-HWV

**NOTICE**

The debtor(s) filed a Chapter13 Bankruptcy Petition on September 30, 2022.

Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney, Douglas R. Roeder, Esquire, has filed a Motion to Dismiss for failure to file the indicated document(s) below:

**- Form 122C-1 CHAPTER 13 STATEMENT OF CURRENT MONTHLY  
INCOME AND CALCULATION OF COMMITMENT PERIOD  
- Form 122C-2 CHAPTER 13 CALCULATION OF YOUR DISPOSABLE  
INCOME**

A hearing with the Court has been scheduled for:

**Date: December 14, 2022  
Time: 09:30 AM  
Location: Ronald Reagan Federal Bldg  
Bankruptcy Courtroom, 3rd Floor  
228 Walnut Street  
Harrisburg, PA 17101**

Any objection/response to the Trustee's Motion to Dismiss must be filed and served on or before: **November 14, 2022**. If Debtor(s) file the missing documents on or before the stated response date, the Motion shall be deemed withdrawn and moot.

Additionally, if you file and serve an objection/response within the time period, a hearing will be held on the above date. If you do not file an objection within the time permitted the Court will deem the motion unopposed and proceed to consider the Motion without further notice or hearing, and may grant the relief requested.

Dated: October 31, 2022

/s/ Douglas R. Roeder, Esquire  
ID: 80016  
Attorney for Movant  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: droeder@pamd13trustee.com

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CHAPTER 13

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CASE NO: 1-22-01893-HWV

**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on October 31, 2022, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1<sup>st</sup> Class mail from Hummelstown, PA, unless served electronically.

Served Electronically

MICHAEL A. CIBIK  
CIBIK LAW,P.C.  
1500 WALNUT ST, STE 900  
PHILADELPHIA PA 19102-

UNITED STATES TRUSTEE  
SUITE 1190  
228 WALNUT STREET  
HARRISBURG, PA 17101

Served by First Class Mail

JAMES MICHAEL NEIL CHANCE  
905 SHERWOOD STREET  
HANOVER PA 17331

I certify under penalty of perjury that the foregoing is true and correct.

Date: October 31, 2022

/s/ Vickie Williams  
Office of the Standing Chapter 13 Trustee  
Jack N. Zaharopoulos  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

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Debtor(s)

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CHAPTER 13 TRUSTEE

Movant

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JAMES MICHAEL NEIL CHANCE

Respondent(s)

**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby ORDERED that the above-captioned bankruptcy be and hereby is DISMISSED. The Court retains jurisdiction to rule on any timely filed fee application.